

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**OLIVIA Y., By and  
Through Her Next Friend,  
James D. Johnson, et al.**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO. 3:04CV251LN**

**HALEY BARBOUR,  
As Governor of the State of Mississippi;  
DONALD TAYLOR, as Executive Director  
of the Department of Human Services; and  
BILLY MANGOLD, as Director of the Division  
of Children's Services**

**DEFENDANTS**

---

**DEFENDANTS' INITIAL DISCLOSURES TO PLAINTIFFS**

---

COME NOW the Defendants, Haley Barbour, as Governor of the State of Mississippi; Donald Taylor, as Executive Director of the Department of Human Services; and Billy Mangold, as Director of the Division of Family and Children's Services, by and through counsel, and file their Initial Disclosures to Plaintiffs, pursuant to Fed. R. Civ. Pro. 26(a)(1) and Local Rule 26.1(A)(1) and submit the following:

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment:

1. Regarding Olivia Y.

(a) All members of Olivia Y.'s biological family, including:

Peggy Yarbrough, biological mother  
301 Parksdale Drive  
Hattiesburg, MS 39403 (last known address)  
Telephone number unknown



Otha Terrance Donald, biological father  
Address and telephone number unknown

Melvin Yarbrough, father  
Address and telephone number unknown

Carolyn Hunter, aunt  
Address and telephone number unknown

Amelia Yarbrough, sister  
301 Parksdale Drive  
Hattiesburg, MS 39403 (last known address)  
Telephone number unknown

Haley Yarbrough, sister  
581 Richburg Road  
Purvis, MS 39475  
Telephone number unknown

Gene Hunter, cousin  
Address and telephone number unknown

Willena Harris, aunt  
Address and telephone number unknown

- (b) All current or former members of Olivia Y.'s foster families, including:

Seaborn and Annette Rainey  
581 Richburg Road  
Purvis, MS 39475  
Telephone number unknown

Ethel Jones  
Address and telephone number unknown

- (c) All current or former DHS personnel or agents who have been involved with Olivia Y., including:

Mickel Hodges  
DEPARTMENT OF HUMAN SERVICES  
DIVISION OF FAMILY AND CHILDREN SERVICES  
750 North State St.  
Jackson, MS 39202  
(601) 359-4500

Mechille Henry, Acting Regional Director  
MARION COUNTY DEPARTMENT OF HUMAN SERVICES  
226 Broad St., Suite 1  
Columbia, MS 39429  
(601) 736-6044

Jean Fertitta, Area Social Worker Supervisor  
Nicole Holloman  
Jennifer McLaurin, LSW  
Jessie Richardson, homemaker  
Deborah Stewart, Area Social Worker Supervisor  
Marie Turnage, LSW  
Christina Morrison  
Kim Rider  
Barry Robertson  
FORREST COUNTY DEPARTMENT OF HUMAN SERVICES  
1604 West Pine Street  
Hattiesburg, MS 39401  
(601) 554-4354

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*s, or Court Appointed Special Advocates who have been involved with Olivia Y., including:

Judge Michael W. McPhail  
FORREST COUNTY YOUTH COURT  
P.O. Box 190  
Hattiesburg, MS 39403  
(601) 545-6075

James D. Johnson, Esq.  
Guardian *Ad Litem*  
301 W. Pine St.  
Hattiesburg, MS 39401  
(601) 583-1937

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with Olivia Y., including:

Emma Foster  
PINEBELT ASSOCIATION FOR COMMUNITY ENHANCEMENT (PACE)  
HEADSTART PROGRAM  
710 Katie Ave.  
Hattiesburg, MS 39401  
(601) 545-8110

Terry Latham, Director  
Valerie Edenfield, Assistant Shelter Manager  
HOPE HAVEN CHILDREN'S SHELTER  
P.O. Box 37  
Bay St. Louis, MS 39520  
(228) 467-7945

Dr. Shama Shakir  
COASTAL FAMILY HEALTH CENTER  
P.O. Box 475  
Biloxi, MS 39533  
(228) 374-2474

(f) Other

Ava Cobbins  
MISSISSIPPI DEPARTMENT OF HEALTH  
Post Office Box 1700  
Jackson, MS 39215-1700  
(601) 576-7400

2. Regarding Jamison J.

(a) All members of Jamison J.'s biological family, including:

Daniel Hysten, biological father  
1956 South Laura  
Wichita, KS 67211  
(316) 806-4356

Toshelia Lewis, sister  
6562 Lyndon B. Johnson Drive  
Jackson, MS 39213  
(601) 981-4077

Shaka McCorker, sister  
Address and telephone number unknown

Ruthie Davis, maternal grandmother  
Address and telephone number unknown

Lloyd and Rosie Hysten, paternal grandparents  
7425 Berryton  
Berryton, KS 66409  
(913) 862-9076

Sharon Wells, friend of family  
Address and telephone number unknown

(b) All current or former members of Jamison J.'s foster families, including:

Charlie and Ora Groves  
Doddsville, MS  
Address and telephone number unknown

Jodie Felton  
923 Parkview Street  
Cleveland, MS 38732  
(662) 843-2061

Mrs. Murphy  
Cleveland, MS  
Address and telephone number unknown

LaVance and Diane Body  
6665 Lake Forest Drive  
Jackson, MS 39206  
(601) 354-1403

James Hennington  
Jackson, MS  
Address and telephone number unknown

Alice Mayers  
Address and telephone number unknown

Orlean Wolfe  
Address and telephone number unknown

Clara Lewis  
6562 Lyndon B. Johnson Drive  
Jackson, MS 39213  
(601) 981-4077

(c) All current or former DHS personnel or agents who have been involved with Jamison J., including:

Billy Mangold, Division of Family and Children's Services  
Gwen Walker, LSW  
Ann Pullum, Administrator, Interstate Compact Placement  
Jeff Wedgeworth, Acting Director, Protection Unit

Gail Young, Director Placement Unit  
Mary Ann Cooper  
Sharon L. Worley, LSW  
DEPARTMENT OF HUMAN SERVICES  
DIVISION OF FAMILY AND CHILDREN SERVICES  
750 North State St.  
Jackson, MS 39202  
(601) 359-4500

Maggie Mixon, Area Social Worker Supervisor  
HINDS COUNTY DEPARTMENT OF HUMAN SERVICES  
4777 Medgar Evers Blvd.  
Jackson, MS 39213  
(601) 362-9892

Martha McDaniel, Regional Director  
Region II – Division of Family and Children Services  
GRENADA COUNTY DEPARTMENT OF HUMAN SERVICES  
1241 S. Mound St.  
Grenada, MS 38902  
(662) 226-1351

Deon Thomas, LSW  
RANKIN COUNTY DEPARTMENT OF HUMAN SERVICES  
603 Marquette Road  
Brandon, MS 39042  
(601) 825-7210

Lucille Ivy, LSW  
Mitsi Pilgrim, LSW  
Mary Wallace, LSW  
Reginald Walker, LSW  
Tracey Modhzain, LSW  
Annie Smith, LSW  
Queen Coleman, Area Social Worker Supervisor  
Terry Hall, Area Social Worker Supervisor  
EAST BOLIVAR COUNTY DEPARTMENT OF HUMAN SERVICES  
P.O. Box 367  
Cleveland, MS 38732  
(662) 843-0294

Jill Blount  
Myrt G. Grisham  
Stanley B. Lee  
Tommie Clinton  
Michele Love

Kim O'Neal  
Sha Aguzzi  
J.D. Cummys  
M. Williams  
Ruby W. Robinson  
Elisha Langdon  
Cathy Caudwell  
Johnnie Johnson  
Roosevelt Grenell  
Rosie Johnson  
Lorie Smith  
Pattie C. Hendricks  
Michael W. Hendricks  
E.J. Doblinton  
Mose James  
Jan Vaughn  
Carolyn Dodge  
DEPARTMENT OF HUMAN SERVICES  
DIVISION OF FAMILY AND CHILDREN SERVICES  
FOSTER CARE REVIEW PROGRAM  
750 North State Street  
Jackson, MS 39202  
(601) 359-4500

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*s, or Court Appointed Special Advocates who have been involved with Jamison J., including:

Judge Kenneth Thomas  
Bolivar County Circuit Court Judge  
P.O. Box 548  
Cleveland, MS 38732-0548  
(662) 846-2939

Judge Patricia D. Beckett  
Senior Status Judge  
P.O. Box 1644  
Cleveland, MS 38732  
(662) 843-4511

Judge Gwendolyn J. Thomas  
Bolivar County Youth Court Judge  
P.O. Box 188  
Cleveland, MS 38732  
(662) 843-7175  
(Also served as Guardian *Ad Litem*)

Albert B. Smith, III, Esq.  
P.O. Box 1887  
Cleveland, MS 38732  
(662) 846-6058

M. Earl Scales  
Special Assistant Attorney General  
OFFICE OF THE ATTORNEY GENERAL  
P.O. Box 220  
Jackson, MS 39205-0220  
(601) 359-4216

Boyd P. Atkinson  
*Guardian Ad Litem*  
P.O. Box 427  
Cleveland, MS 38732  
(662) 843-9766

John Cox, Esq.  
*Guardian Ad Litem*  
P.O. Box 608  
Cleveland, MS 38730  
(662) 843-8351

Sherry Van Liew, Former Director  
Pattie C. Hendricks, Director  
Mr. Ross  
BOLIVAR COUNTY CASA  
204 N. Pearman Ave.  
Cleveland, MS 38732  
(662) 846-6394

William K. Dossett, Esq.  
125 South Court  
P.O. Box 1494  
Cleveland, MS 38732  
(662) 846-0690

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with Jamison J., including:

Dr. Camille Baker Branton  
Address and telephone number unknown



Dr. Cynthia Undesser  
UNIVERSITY OF MISSISSIPPI MEDICAL CENTER  
2500 N. State St.  
Jackson, MS 39211  
(601) 984-5820

LAUREL WOOD CENTER  
5000 Highway 39 N  
Meridian, MS 39301  
(601) 483-6211

OUR HOUSE SHELTER  
942 North St.  
Jackson, MS 39202  
(601) 355-0161

MILLCREEK BEHAVIORAL HEALTH SERVICES  
P.O. Box 1160  
Magee, MS 39111  
(601) 849-4221

HOPE HAVEN  
5102 Robinson Road Ext.  
Jackson, MS 39204  
(601) 376-0500

YOUTH VILLAGES  
MEMPHIS BOYS TOWN  
7410 Memphis-Arlington Rd.  
Memphis, TN 38135  
(901) 252-7800

SUNNY-BROOK CHILDREN'S HOME  
P.O. Box 4871  
Jackson, MS 39296  
(601) 856-6555

SALLY KATE WINTER CHILDREN' HOME  
317 North Division St.  
West Point, MS 39773  
(662) 494-4867

Lora Reeves  
Sherry Azordegan  
Cindy Hardy  
Kelly Wilson  
Dr. Joy Hogge

Sharon White  
Monica Porter  
Gayle Watts  
Linda Raff  
CATHOLIC CHARITIES OF JACKSON  
(Our House shelter, Hope Have shelter)  
P.O. Box 2248  
Jackson, MS 39225  
(601) 355-8634

Anita Williams, counselor  
Address and telephone number unknown

Patricia Swafford, psychometrist  
Address and telephone number unknown

Joyce Smith  
Emily Tillman  
Kaye Pepper  
Alfredia Miller  
Administrators and various fifth grade teachers  
WATKINS ELEMENTARY  
3915 Watkins Drive  
Jackson, MS 39206  
(601) 987-3594

Daniel Watkins  
Ms. Mott  
Administrators and various sixth grade teachers  
POWELL MIDDLE SCHOOL  
3655 Livingston Road  
Jackson, MS 39213  
(601) 987-3580

Beray Thigpen  
Charles Bishop  
Administrators and various seventh grade teachers  
NORTHWEST JACKSON MIDDLE SCHOOL  
7020 Medgar Evers Blvd.  
Jackson, MS 39213  
(601) 987-3609

Mr. S. Blackwell  
Administrators and various eighth grade teachers  
MORRIS-WILSON CAMPUS SCHOOL  
P.O. Drawer D

Eads, TN 38028  
Telephone number unknown

Dr. Cynthia Johnson  
Administrators and various tenth grade teachers  
CALLAWAY HIGH SCHOOL  
601 Beasley Road  
Jackson, MS 39206  
(601) 987-3535

Administrators and various eleventh grade teachers  
WEST HIGH SCHOOL  
820 S. Osage St.  
Wichita, KS 67213  
(316) 973-3600

OAKLEY TRAINING SCHOOL  
Transitional Living Center  
2375 Oakley Drive  
Raymond, MS 39154  
(601) 857-2288

(f) Other

Shirley Crenshaw  
Peggy Baker, Coordinator - Youth and Adult Services Commission  
KANSAS DEPARTMENT OF SOCIAL AND REHABILITATIVE SERVICES  
915 SW Harrison St.  
Topeka, KS 66612  
(785) 296-3959

3. Regarding John A.

(a) All members of John A.'s biological family, including:

Pamela Austin, biological mother  
Address and telephone number unknown

James Magee, biological father  
Address and telephone number unknown

(b) All current or former members of John A.'s foster families, including:

Willie and Velma Carpenter  
Address and telephone number unknown

Edward and Anna Bolton  
124 Taylor Road  
Hattiesburg, MS 39401  
(601) 584-7709

Angela Davis  
Address and telephone number unknown

Martha Atkins  
4312 Kreole Ave.  
Moss Point, MS 39563  
(228) 474-6258

Ophelia Coleman  
Address and telephone number unknown

Seaborn and Annette Rainey  
581 Richburg Road  
Purvis, MS 39475  
Telephone number unknown

- (c) All current or former DHS personnel or agents who have been involved with John A., including:

Mechille Henry, Regional Director  
Region VI – Division of Family and Children Services  
MARION COUNTY DEPARTMENT OF HUMAN SERVICES  
226 Broad St., Suite 1  
Columbia, MS 39429  
(601) 736-6044

Jean Fertitta, Area Social Worker Supervisor  
Beejee Dickson, Area Social Worker Supervisor  
Ramona Lockett, Area Social Worker Supervisor  
Josie Brown, LSW  
Jessie Richardson, homemaker  
Deanne Cunningham, LSW  
Rosie Cox, aide  
Barry Robertson, LSW  
John Walker  
Kim Rider, LSW  
Sherita Bovastro, LSW  
Terra McCarthy, LSW  
Kathy Hightower  
Melissa Lyons  
Cindy Stubblefield

Sharron Robinson  
Cindy Haslauer  
Betty Rayner  
Tena McCarty  
Tabatha Enis  
FORREST COUNTY DEPARTMENT OF HUMAN SERVICES  
1604 West Pine Street  
Hattiesburg, MS 39401  
(601) 554-4354

Carrie Monsow, Area Social Worker Supervisor  
DESOTO COUNTY DEPARTMENT OF HUMAN SERVICES  
425 E. Commerce Street  
Hernando, MS 38632  
(662) 429-4461

Tabathas Cox, LSW  
PONTOTOC COUNTY DEPARTMENT OF HUMAN SERVICES  
P.O. Box 419  
Pontotoc, MS 38863  
(662) 489-4182

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*s, or Court Appointed Special Advocates who have been involved with John A., including:

Judge Michael W. McPhail  
FORREST COUNTY YOUTH COURT  
P.O. Box 190  
Hattiesburg, MS 39403  
(601) 545-6075

James D. Johnson, Esq.  
301 W. Pine St.  
Hattiesburg, MS 39401  
(601) 583-1937

Cliff Gaddis  
Guardian *Ad Litem*  
OFFICE OF THE DISTRICT ATTORNEY  
109 Shady Lane  
Hattiesburg, MS 39402  
(601) 545-1551

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with John A., including:

MILLCREEK BEHAVIORAL HEALTH SERVICES  
P.O. Box 1160  
Magee, MS 39111  
(601) 849-4221

Johnny Skinner, teacher  
Lois Cox, social worker and therapist  
Terry Tessena, therapist  
MILLCREEK OF PONTOTOC  
1814 Highway 15 North  
P.O. Box 619  
Pontotoc, MS 38863  
(662) 488-1023

James Chastain, Director  
Kristie Brister Medico, Legal Aspects Coordinator  
MISSISSIPPI STATE HOSPITAL  
PO Box 157-A  
Whitfield, MS 39193  
(601) 351-8018

Dr. Barbara Murray  
Dr. Anthony Pollard  
Dr. William Gasparrini  
Marla Rogers  
GULFPORT MEMORIAL HOSPITAL, BEHAVIORAL HEALTH UNIT  
11150 Hwy. 49 North  
Gulfport, MS 39503  
(800) 831-1700

Mr. Jasper Gunn  
YOUTH VILLAGES  
MEMPHIS BOYS TOWN  
7410 Memphis-Arlington Rd.  
Memphis, TN 38135  
(901) 252-7800

Dr. William P. Osborn  
SASSAFRAS HILL COUNSELING CENTER  
4824 Old Highway 11  
Purvis, MS 39475  
(601) 264-9515

Dr. Charles Greer  
Dentist  
Address and telephone number unknown

BACOT HOME FOR YOUTH  
4021 Chicot St.  
Pascagoula, MS 39581  
(228) 769-0477

ALLIANCE HEALTH CENTER  
5000 Highway 39 N  
Meridian, MS 39301  
(601) 483-6211

DESOTO SUNRISE HOMES  
1281 Main Street  
Southaven, Mississippi 38671  
(662) 342-0155

HOPE HAVEN CHILDREN'S SHELTER  
P.O. Box 37  
Bay St. Louis, MS 39520  
(228) 467-7945

PINE GROVE  
2255 Broadway Drive  
Hattiesburg, MS 39401  
(601) 288-2273

DIXIE ELEMENTARY SCHOOL  
790 Elks Lake Road  
Hattiesburg, MS 39401  
(601) 582-4890

HAWKINS ELEMENTARY SCHOOL  
526 Forrest Street  
Hattiesburg, MS 39401  
(601) 583-4311

NICHOLAS HOBBS ACADEMY  
7410 Memphis Arlington Rd  
Memphis, TN 38135  
(901) 252-7812

MERCY HOUSE MINISTRIES  
21701 County Home Rd  
Moss Point, MS 39562  
(228) 588-2093

4. Regarding Cody B.

(a) All members of Cody B.'s biological family, including:

Betty L Hartfield, biological mother  
4203 Knowles Ave. #120  
Moss Point, MS 39563 (last known address)  
Telephone number unknown

Calvin B. Burks, Sr., biological father  
4203 Knowles Ave. #120  
Moss Point, MS 39563 (last known address)  
Telephone number unknown

Vinney Dread, cousin  
Address and telephone number unknown

LauSunda Clark, maternal cousin  
Address and telephone number unknown

Ann Jones, cousin  
Address and telephone number unknown

Tonya Chapman, maternal aunt  
Address and telephone number unknown

Quinesta McSwain, paternal aunt  
Hattiesburg  
Address and telephone number unknown

Annie and Anthony Keyes, maternal grandmother and husband  
Address and telephone number unknown

Betty Simmons, maternal aunt  
Address and telephone number unknown

Jake, Sean, Josh, Amber, Shantea, siblings  
Address and telephone number unknown

(b) All current or former members of Cody B.'s foster families, including:



Beverly Bolton  
5443 Winona Drive  
Moss Point, MS 39563  
(228) 475-9889

Bridget Thigpen  
Babysitter while at Ms. Bolton's home  
Address and telephone number unknown

Darryl and Melissa Boykin  
2505 Pollock Ferry Road  
Moss Point, MS 39562  
Telephone number unknown

Romeo and Cassandra Brown  
3614 Reeves Lane  
Ocean Springs, MS 39564  
(228) 872-8369

- (c) All current or former DHS personnel or agents who have been involved with Cody B., including:

Zadie B. Rogers, Regional Director  
HARRISON COUNTY DEPARTMENT OF HUMAN SERVICES  
1141 Bayview Avenue, 5th Floor  
Biloxi, MS 39530  
(228) 432-0225

Angela Ashford, Family Preservation Specialist  
DEPARTMENT OF HUMAN SERVICES  
DIVISION OF FAMILY AND CHILDREN SERVICES  
750 North State Street  
Jackson, MS 39202  
(601) 359-4500

Tasha Jackson, Program Specialist  
Mary Williams, Program Specialist  
DEPARTMENT OF HUMAN SERVICES  
IVE/CWS Eligibility Determination Unit  
750 North State Street  
Jackson, MS 39202  
(601) 359-4500

Gwendolyn L. Beck, LSW  
Deborah Stallworth  
Gloria Richardson, LSW

Matt Matthews, Area Social Worker Supervisor  
Yutaska Simpson, LSW  
Sharon Carter, homemaker  
Linda Smith, intake officer  
Brenda Coe, Area Social Worker Supervisor  
JACKSON COUNTY DEPARTMENT OF HUMAN SERVICES  
P.O. Box 789  
Pascagoula, MS 39568  
(228) 769-3275

Carolyn Dodge  
DEPARTMENT OF HUMAN SERVICES  
DIVISION OF FAMILY AND CHILDREN SERVICES  
Foster Care Review Program  
750 North State Street  
Jackson, MS 39202  
(601) 359-4500

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*s, or Court Appointed Special Advocates who have been involved with Cody B., including:

Nancy Fagan, Youth Court Abuse and Neglect Intake  
Pat Brown  
Cynthia Wilson, Youth Court Administrator  
JACKSON COUNTY YOUTH COURT  
4903 Telephone Road  
Pascagoula, MS 39567  
(228) 762-7370

Janice Perreault  
Former Prosecutor  
1253 Jackson Ave.  
Pascagoula, MA 39567  
(228) 938-9500

Brice Wiggins  
Assistant District Attorney  
19th Judicial District of Mississippi  
4903 Telephone Road  
Pascagoula, MS 39567  
(228) 762-7370

Jim Smallwood  
Prosecutor  
4903 Telephone Road

Pascagoula, MS 39567  
(228) 762-7370

Jennifer Harris, Esq.  
*Guardian Ad Litem*  
P.O. Box 510  
Pascagoula, MS 39568  
(228) 696-0228

Denise Lee  
*Guardian Ad Litem*  
Address and telephone number unknown

Terry Holtz, Esq.  
P.O. Box 987  
Ocean Springs, MS 39564  
(228) 872-9224

Linda Boozer, Esq.  
15 St. Andrews Dr.  
Jackson, MS 39211  
(601) 956-0392

Judge Alvin Chase  
JACKSON COUNTY YOUTH COURT JUDGE  
4903 Telephone Road  
Pascagoula, MS 39567  
(228) 762-7370

Judge Maxine Lawson-Conway  
JACKSON COUNTY YOUTH COURT JUDGE  
4903 Telephone Road  
Pascagoula, MS 39567  
(228) 762-7370

Judge Sharon W. Sigalas  
JACKSON COUNTY YOUTH COURT JUDGE  
4903 Telephone Road  
Pascagoula, MS 39567  
(228) 762-7370

Laura Singleton  
Connie West Portas  
JACKSON COUNTY CASA  
4903 Telephone Road  
Pascagoula, MS 39567

(228) 762-7370

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with Cody B., including:

Dr. J. Donald Matherne  
CENTER FOR BEHAVIORAL MEDICINE  
2710 Beach Blvd # 6D  
Biloxi, MS 39531-4401  
(228) 385-1827

Grace Sutterfield, nurse  
WELL BABY CLINIC  
Jackson County Health Department  
4302 Hospital Road  
Pascagoula, MS 39581  
(228) 762-1117

Kim McClammey  
CENTER FOR THE PREVENTION OF CHILD ABUSE  
Address and telephone number unknown

Bridgett Pickett  
FIRST STEP EARLY INTERVENTION PROGRAM  
MISSISSIPPI STATE DEPARTMENT OF HEALTH  
4302 Hospital Road  
Pascagoula, MS 39581  
(228) 762-1117

Marilyn Montgomery, shelter supervisor  
RHONDA H. CRANE MEMORIAL YOUTH SHELTER  
JACKSON COUNTY CHILDREN'S SERVICES COALITION  
P.O. Box 1856  
Gautier, MS 39553  
(228) 762-7370

Dr. Michael Seymour  
Dr. Andrew Ragula  
SINGING RIVER HOSPITAL  
2809 Denny Avenue  
Pascagoula, MS 39581  
(228) 809-5154

Ladd Chandler, teacher  
Deanna Gray, speech pathologist

Dyane Held, physical therapist  
Ronnie Bether, social worker  
Delois Catchings, teacher assistant  
SOUTH MISSISSIPPI REGIONAL CENTER  
Project PRINTS  
3257 Hwy. 90  
Gautier, MS 39553  
(228) 497-4568

Dr. Grzayna Wierbicka  
CHILDREN'S CLINIC OF PASCAGOULA  
421 Delmas Ave.  
Suite A  
Pascagoula, MS 39567  
(228) 762-8712

Angela Carpenter, LSW  
MISSISSIPPI STATE DEPARTMENT OF HEALTH  
4302 Hospital Road  
Pascagoula, MS 39581  
(228) 762-1117

(f) Other

PASCAGOULA POLICE DEPARTMENT  
611 Live Oak Ave.  
Pascagoula, MS 39567  
(228) 762-2211

Venua Durr  
reporter of abuse  
4612 Main Street, #5  
Moss Point, MS  
Telephone number unknown

5. Regarding Mary, Tom, Matthew, and Dana W. (the "W. children")

(a) All members of the W. children's biological family, including:

Tracey Lee Williams, biological mother  
Address and telephone number unknown

Markus Lee Williams, biological father  
Address and telephone number unknown

Lawrence and Zelatra L. Williams, paternal uncle and wife

1069 Bala Chitto Road  
Magnolia, MS 39652  
(601) 783-3662

- (b) All current or former members of the W. children's foster families, including:

Clara Jones  
Address and telephone number unknown

Brenda West  
755 Glencross Drive Apt. 89  
Jackson, MS 39206  
Telephone number unknown

Ida Varnell  
Address and telephone number unknown

- (c) All current or former DHS personnel or agents who have been involved with the W. children, including:

Mary Williams, Program Specialist  
Mahalia Wright, Program Specialist  
Tasha Jackson, Program Specialist  
DEPARTMENT OF HUMAN SERVICES  
IVE/CWS Eligibility Determination Unit  
750 North State Street  
Jackson, MS 39202  
(601) 359-4500

Jennie N. Hall, LSW  
Ronda Aldridge, LSW  
Emily Brown, LSW  
Carolyn Roberts, Area Social Worker Supervisor  
Angela Fields, Area Social Worker Supervisor  
Maggie Mixon, Area Social Worker Supervisor  
HINDS COUNTY DEPARTMENT OF HUMAN SERVICES  
4777 Medgar Evers Blvd.  
Jackson, MS 39213  
(601) 362-9892

Lacey O'Quin, LSW  
WALTHALL COUNTY DEPARTMENT OF HUMAN SERVICES  
P.O. Box 430  
Tylertown, MS 39667  
(601) 876-3238

Rachel Sullivan, foster care reviewer  
DEPARTMENT OF HUMAN SERVICES  
DIVISION OF FAMILY AND CHILDREN SERVICES  
Foster Care Review Program  
750 North State Street  
Jackson, MS 39202  
(601) 359-4500

- (d) All current or former court personnel, attorneys, legal representatives, guardian *ad litem*s, or Court Appointed Special Advocates who have been involved with the W. children including:

Judge Houston Patton  
HINDS COUNTY YOUTH COURT JUDGE  
P.O. Box 327  
Jackson, MS 39205-0327  
(601) 968-6663

Judge William Singletary  
HINDS COUNTY CHANCERY COURT JUDGE  
P.O. Box 686  
Jackson, MS 39205  
(601) 968-6548

John Gadow  
P.O. Box 23662  
Jackson, MS 39225  
(601) 212-4115

Angela Gray Marshall  
Guardian *Ad Litem*  
P.O. Box 6971  
Jackson, MS 39282  
(601) 346-4488

Malcolm Harrison  
P.O. Box 483  
Jackson, MS 39205-0483  
(601) 948-5030

Bridgette W. Wiggins  
Special Assistant Attorney General  
OFFICE OF THE ATTORNEY GENERAL  
P.O. Box 220  
Jackson, MS 39205-0220

(601) 359-4247

- (e) All current or former employees or agents of service providers, medical institutions, group homes, emergency shelters, and educational institutions who have been involved with the W. children, including:

Lou Moore, RN  
UNACARE  
University Nursing Associates, PLLC  
1207 North West Street  
Jackson, MS 39202  
(601) 354-6654

John B. Jolly, Psy.D, ABPP  
Clinical Psychologist  
MISSISSIPPI COLLEGE  
Box 4013  
105 Lowrey Hall  
Clinton, MS 39058  
(601) 952-2995

Dr. Hill-Chance, therapist  
Address unknown  
(601) 894-5110

Dr. Philip Meredith  
Steven R. Stafford, therapist  
BRENTWOOD HEALTHCARE OF MISSISSIPPI  
3531 Lakeland Dr.  
Jackson, MS 39232  
(601) 936-2024

Leah Yeatts  
PINE GROVE COUNSELING CENTER OF JACKSON  
2 Old River Place, Suite O  
Jackson, MS 39202  
(601) 355-5600

Dr. Diane Little  
PINE GROVE  
P.O. Box 16389  
Hattiesburg, MS 39404-6389  
(601) 288-2273

BROWN ELEMENTARY SCHOOL  
146 E. Ash St.



Jackson, MS 39202  
(601) 960-5326

EMMANUEL CHRISTIAN ACADEMY  
1023 Langley Ave.  
Jackson, MS 39204  
(601) 969-9597

Mae Baity, teacher  
JOHNSON ELEMENTARY SCHOOL  
1339 Oak Park Drive  
Jackson, MS 39213  
(601) 987-3501

NORTH JACKSON ELEMENTARY SCHOOL  
650 James M. Davis Dr.  
Jackson, MS 39206  
(601) 987-3528

Cheryl Brent, teacher  
BRINKLEY MIDDLE SCHOOL  
3535 Albermarle Road  
Jackson, MS 39213  
(601) 987-3573

SOUTH PIKE SCHOOL DISTRICT  
250 West Bay Street  
P.O. Box 71  
Magnolia, MS 39652  
(601) 783-3742

Connie McNab, principal  
EVA GORDON ELEMENTARY SCHOOL  
1175 N. Clark Street  
Magnolia, MS 39652  
(601) 783-5983

Emily Brewer, LSW  
CHRISTIANS IN ACTION SHELTER  
Jackson, MS  
Address unknown  
(601) 353-1942

- B. A copy of all documents, data compilations, and tangible things in the possession, custody, or control of Defendants, that may be used to support their claims or defenses, unless solely for impeachment:

- i. Policies and Procedures of the Mississippi Department of Human Services, Division of Family and Children's Services.
- C. Insurance Information: The following documents may contain discoverable information:
  1. Not applicable
- D. Experts: The Defendants have not yet retained an expert to testify in this case. However, Defendants reserve the right to do so and will timely supplement disclosures.
- E. Supplementation: Defendants reserve the right to supplement this disclosure as to the identity of expert witnesses, lay witnesses, documents, and tangible things which may be disclosed during the discovery process.
- F. Withholding: The only information being withheld at this time consists of correspondence between Defendants and their attorney and attorney notes, which are protected by attorney-client privilege.

The preceding disclosures express no opinion of and constitute no admission regarding the admissibility of any evidence in this or any other action.

Respectfully submitted,

**HALEY BARBOUR, as Governor of the State of Mississippi; DONALD TAYLOR, as Executive Director of the Department of Human Services; and BILLY MANGOLD as Director of the Division of Family and Children's Services**

**McGlinchey Stafford, PLLC**

By:  Betty A. Mallett (MSB #8867)

**CERTIFICATE OF SERVICE**

I, Betty A. Mallett, do hereby certify that I have this day served a copy of the foregoing on counsel of record by United States Mail, postage prepaid to:

W. Wayne Drinkwater, Jr., Esq.  
Melody McAnally, Esq.  
BRADLEY ARANT ROSE & WHITE LLP  
Suite 450, One Jackson Place  
Post Office Box 1789  
Jackson, MS 39215

Marcia Robinson Lowry, Esq.  
Eric E. Thompson, Esq.  
Shirim Nothenberg, Esq.  
CHILDREN'S RIGHTS  
404 Park Avenue  
New York, New York 10016

Stephen H. Leech, Esq.  
850 East River Place, Suite 300  
Jackson, Mississippi 39215

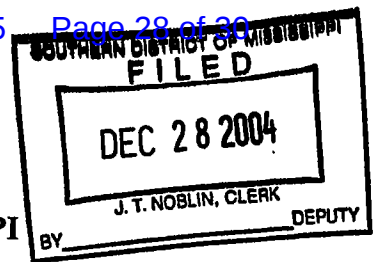
John Lang, Esq.  
LOEB & LOEB, LLP  
345 Park Avenue  
New York, New York 10154

Harold E. Pizzetta, III  
Special Assistant Attorney General  
OFFICE OF THE ATTORNEY GENERAL  
P.O. Box 220  
Jackson, MS 39205

SO CERTIFIED, this the 28<sup>th</sup> day of December, 2004.

  
Betty A. Mallett

168373.1



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**OLIVIA Y., By and  
Through Her Next Friend,  
James D. Johnson, et al.**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO. 3:04CV251LN**

**HALEY BARBOUR,  
As Governor of the State of Mississippi;  
DONALD TAYLOR, as Executive Director  
of the Department of Human Services; and  
BILLY MANGOLD, as Director of the Division  
of Children's Services**

**DEFENDANTS**

**NOTICE OF SERVICE**

Notice is hereby given that Defendants Haley Barbour, Donald Taylor, and Billy Mangold have caused to be served in the above matter the following:

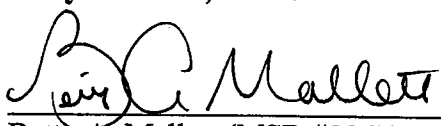
1. Defendants' Initial Disclosures to Plaintiffs.
2. Computerized documentation regarding Named Plaintiffs and accompanying Privileged Log pursuant to Order of the Court dated December 17, 2004.

This, the 28th day of December, 2004.

Respectfully submitted,

**HALEY BARBOUR, as Governor of the State of  
Mississippi; DONALD TAYLOR, as Executive Director  
of the Department of Human Services; and  
BILLY MANGOLD as Director of the Division of  
Family and Children's Services**

**McGlinchey Stafford, PLLC**

  
By: Betty A. Mallett (MSB #8867)

OF COUNSEL:

Attorney General Jim Hood  
State of Mississippi  
P.O. Box 220  
Jackson, MS 39205-0220

**McGLINCHEY STAFFORD, PLLC**

Sam E. Scott (MSB #6567)  
Betty A. Mallett (MSB #8867)  
Amy Kebert Elder (MSB #99149)  
City Centre South, Suite 1100  
200 South Lamar Street (39201)  
Post Office Box 22949  
Jackson, Mississippi 39225  
Telephone: (601) 960-8400  
Facsimile: (601) 352-7757

**CERTIFICATE OF SERVICE**

I, Betty A. Mallett, do hereby certify that I have this day served a copy of the foregoing on counsel of record by United States Mail, postage prepaid to:

W. Wayne Drinkwater, Jr., Esq.  
Melody McAnally, Esq.  
BRADLEY ARANT ROSE & WHITE LLP  
Suite 450, One Jackson Place  
Post Office Box 1789  
Jackson, MS 39215

Marcia Robinson Lowry, Esq.  
Eric E. Thompson, Esq.  
Shirim Nothenberg, Esq.  
CHILDREN'S RIGHTS  
404 Park Avenue  
New York, New York 10016

Stephen H. Leech, Esq.  
850 East River Place, Suite 300  
Jackson, Mississippi 39215

John Lang, Esq.  
LOEB & LOEB, LLP  
345 Park Avenue  
New York, New York 10154

Harold E. Pizzetta, III  
Special Assistant Attorney General  
OFFICE OF THE ATTORNEY GENERAL  
P.O. Box 220  
Jackson, MS 39205

**SO CERTIFIED**, this the 28th day of December, 2004.

  
Betty A. Mallett

168841.1